MICHAEL J. RINIS RINIS TRAVEL SERVICE, INC 9517 GEORGIA AVE SILVER SPRING, MD 20910

February 27, 2015

Clerk of the Court
U.S. District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07101

Robert A. Curtis, Esq. Foley Bezek Behle & Curtis, LLP 15 West Carrillo Street Santa Barbara, CA 93101 Henry Weissmann, Esq. Munger, Tolles & Olson LLP 355 South Grand Avenue 35th Floor Los Angeles, CA 90071

Dear Judge Linares,

I am a Settlement Class Member. My claim number is CDK-11500921801 - 833388. My Verizon wireless phone number is (301) 7##-18##. My business phone number is (301) 587-1021. Pursuant to paragraph 16 of the notice, I object to the proposed Settlement for the following reasons.

- 1. This is a coupon settlement wherein Verizon will supply the class with \$27,500,000.00 in coupons, referred to in the settlement as PINs. The PINs (coupons): expire two years from the date class members are mailed or emailed their PINs (coupons); and they are not refundable, cannot be recharged and have no cash redemption value. Therefore, there is little or no possibility that there will be a secondary market for class members Pins (coupons).
- 2. In anticipation of class counsel arguing the value of these PINs (coupons), I suggest that the court pay class counsel in PINs (coupons).
- 3. The notice fails to mention: how many people are in the class; how much the aggregate class was overcharged; or, what the estimated pro rate share payment per class member is. So, for all a class members knows, we could each be receiving one penny on the dollar as damages.
- 4. The cash settlement portion of the proposed settlement is \$36,700,000.00. Class counsel is requesting \$19,260,000.00 of the \$36,700,000.00 as attorneys' fees. If the court were to grant the requested fee the class would receive 47.52% of the cash and the attorneys would receive 52.48% of the cash.

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- 5. 30% of the \$36,700,000.00 cash value of the proposed settlement is too high a percentage and would result in and \$11.01 Million fee. A reasonable percentage of the cash value of the proposed settlement is 20% which would result in a \$7.34 Million fee.
- 6. 30% of the value of the \$27,500,000.00 in PINs (coupons) is \$8.25 Million in PINs (coupons). If the court declines to pay class counsel in PINs (coupons) the reasonable percentage of the \$27,500,000.00 in non-cash value of the proposed settlement would be, at best, 10%; \$2.7 Million.
- 7. Combining the reasonable attorneys' fee amounts for both the cash and non-cash portions of the proposed settlement results in a reasonable attorneys' fee of \$10.04 Million.

Thanking you in advance for your consideration my objections.

Sincerely yours,

Michael J. Rinis J. Rinis

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